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May 5, 2003

VIA UPS OVERNIGHT

Eileen E. Furey
Associate Regional Counsel (C-14J)
USEPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3507

RE: Response of American Fibrit, Inc. to Request for Information Pursuant to Section 104(e) of CERCLA for Allied Paper/Portage Creek/Kalamazoo River Superfund Site in Kalamazoo and Allegan Counties, Michigan

Dear Ms. Furey:

Enclosed please find the response of American Fibrit, Inc. to the above referenced §104(e) Information Request. If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

QUARLES & BRADY LLP

Rachel A. Schneider

RS2:lg1
Enclosures
cc: Dennis Reis
Greg Ingram

AMERICAN FIBRIT RESPONSES TO EPA INFORMATION REQUESTS

On March 7, 2003, American Fibrit, Inc. received a 104(e) information request seeking (1) information and documents regarding the release of hazardous substances, particularly PCBs, at and from any American Fibrit mill; (2) information to assist EPA determine to what extent American Fibrit purchased NCR paper broke or NCR paper trim; and (3) information to assist EPA determine the quantity and fate of PCBs contained in wastes generated at any American Fibrit mill from 1954-1989.

As a preface to responding to the specific requests, American Fibrit provides the following overview of its facility and operation. The American Fibrit mill in Battle Creek, Michigan, is the only facility of its kind in North America. It is also the only American Fibrit facility. The facility was built in 1977 by Deutschland Fibrit and began operating in 1978. American Fibrit, Inc. was incorporated in Michigan in November 1977.

The facility uses a proprietary German process to make door panels and other interior parts for vehicles out of wood fiber. Through 1989, wood chips from Michigan were the raw material feedstock that initiated the process. The chips were steamed, slivered and baled. (Beginning in 2000, slivered feedstock was purchased.) The slivered feedstock is put in a mixer and stewed in hot water with polyethylene and polystyrene fibers, a form of virgin pulp, a bonding agent and antibacterials to form an "oatmeal." The oatmeal mixture is propelled through a large hot press into the desired shape. The water is removed, the molded part is dried, and the finished part emerges

The process has never used recycled materials from the paper industry. American Fibrit never purchased or used NCR paper broke, NCR converter trim, or any other pulp source that could be considered a source of PCBs in wastes. American Fibrit objects to these information requests as overbroad, vague and burdensome in that they seek information not relevant to determining the extent PCBs may or may not have been contained in wastes at or from American Fibrit.

Fiber Furnish and Paper Production

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

   Response No. 1: Greg Ingram, Environmental & Safety Coordinator, Simon Corey, Factory Manager, and Rowdy Turner, Process Engineer, American Fibrit, Inc., 76 Armstrong Road, Battle Creek, Michigan 49015, (269) 966-6445. Mr. Ingram, Mr. Corey and Mr. Turner may be contacted through counsel: Dennis Reis, Dennis Reis LLC. P.O. Box 170740, Milwaukee, Wisconsin 53217-8061, (414) 540-1005.

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

   Response No. 2: Responsive and relevant documents are referenced in specific responses where applicable and enclosed with these responses.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request, or who may be able to provide additional responsive documents, identify such persons.

Response No. 3: None.

4. Identify and generally describe each American Fibrit mill, as that term is defined in Attachment 5.

Response No. 4: See introductory paragraphs. There is one American Fibrit mill located at 76 Armstrong Road, Battle Creek, Michigan. This mill was opened in 1978 by American Fibrit, Inc., a Michigan corporation since November 1977.

5. Identify current and prior owners of each American Fibrit mill identified in response to Request #4. For each such owner or prior owner, further identify:

Response No. 5: The American Fibrit mill has always been owned by American Fibrit, Inc. See Response No. 7.

a) the property owned;

b) the dates of ownership;

c) all evidence showing that the owner controls or controlled access to any portion of the property;

d) all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at or from the owner's property during the period of its ownership; and

e) the nature of each transaction by which ownership of the mill was transferred from one party to another (*e.g.*, stock purchaser, merger, asset sale, etc.)

6. Identify all current and prior operators, including lessors, of each American Fibrit mill identified in response to Request #4, or any portion thereof. For each such operator, further identify:

Response No. 6: There have been no other operators or lessors of the American Fibrit mill.

a) the property at which it conducts or conducted operations;

b) the dates of operation;

c) the nature of the operator's operations;

d) all evidence that the operator controls or controlled access to the property or any portion thereof; and

e) all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the portion of the property at which the operator conducts or conducted operations.

7. Identify each source or potential source of the release of hazardous substances, pollutants, or contaminants (*e.g.*, polychlorinated biphenyls or "PCBs") from the American Fibrit mill including, without limitation:

Response No. 7: See responses to each subpart below.

a) discharges of total suspended solids ("TSS") in wastewater;

a) Wastewater from the American Fibrit mill is discharged to the Battle Creek, Michigan POTW. The document at Attachment A summarizes data on suspended solids in the wastewater from 1986 to date. Attachment B is an analytical report from November 1995 and is the oldest analytical report located regarding the mill's wastewater discharge. The manufacturing process in 1995 was the same as from 1978-1989.

b) erosion from waste disposal areas located at the American Fibrit mill or elsewhere (*e.g.*, landfill areas) used for the disposal of wastes generated at the American Fibrit mill;

b) There are no waste disposal areas located at the American Fibrit mill. Dry solid waste which cannot be reprocessed is disposed by Waste Management of Battle Creek.

c) exceedances of TSS loading limits established by the State of Michigan and/or U.S. EPA;

c) Not applicable.

d) dewatering lagoon areas located at the American Fibrit mill;

d) Not applicable.

e) storm sewer leaks and discharges;

e) American Fibrit experienced an explosion in 2002 which caused a release of 60-80 gallons of heat transfer fluid to the stormwater drain, but is not aware of any other leaks and discharges from its machines, transformers or other equipment at its mill. See Attachment C (additional documentation available upon request).

f) sewer line leaks and discharges; and

f) In 1998, the mill experienced a small release of an oil/water mixture to the sewer. See Attachment D.

g) machine, transformer or other equipment leaks and discharges.

g) See Response No. 7(e).

8. Identify any data, analyses or other information regarding the nature and quantity of hazardous substances released from each source or potential source you identified in response to Request #7, above. To the greatest extent possible, identify any such data, estimates, analyses or other information on an annual basis from 1954 through 1989.

Response No. 8: See Response No. 7.

9. For the period 1954 to 1989, identify for each year the types and amounts of fiber furnish used at each American Fibrit mill in tons. Fiber furnish may include, but is not limited to, old corrugated container (OCC); double-lined kraft (DLK); paperboard; mixed waste paper; fine paper, bond, ledger, envelopes; old newsprint (ONP); pulp substitutes (specify type and source), purchased secondary fiber pulp (specify source); and virgin pulp (specify type).

Response No. 9: Northern bleached kraft pulp, a virgin pulp (no recycled content), is added to the wood fiber mixture and constitutes approximately 20-30 percent of the product. In 2002, the mill used 1208 tons of this kraft pulp and similar quantities would have been used in past years. See Attachment E.

10. For the period 1954 to 1989 and for each American Fibrit mill, identify the types and amounts of paper products produced annually in tons.

Response No. 10: None, American Fibrit produces wood fiber products, not paper products.

11. For each paper product identified in response to Request #10, identify calculated shrinkage (*i.e.*, yield on fiber furnish) for each paper product on an annual basis. If not available, identify typical or estimated shrinkage for each paper product.

Response No. 11: Not applicable.

12. Identify, for each American Fibrit mill, the annual operating days per year.

Response No. 12: Information from the relevant time frame is no longer available. From 1997 through 2002, the mill operated 300 to 350 days per year.

13. For the period 1954 through 1971, identify the dates (month and year) and amounts in pounds of NCR paper broke that you purchased directly or otherwise obtained from any

of the sources listed in Attachment 2, or from any other NCR paper coating facility.

Response No. 13: None.

14. For the period 1954 through 1971, identify the dates (month and year) and amounts in pounds of NCR paper broke and/or NCR paper converter trim that you purchased or otherwise obtained directly from or through any waste paper broker listed in Attachment 3, or from any other person. Identify, to the extent possible, the name and address of the waste paper broker or other person from whom the NCR paper broke and/or NCR paper converter trim was obtained or purchased.

Response No. 14: None.

15. For the period 1954 through 1989, identify the dates (month and year) and amounts in pounds of post-consumer waste paper that you purchased or otherwise obtained directly from or through any waste paper broker listed in Attachment 3, or from any other person. To the extent possible, identify the name and address of the waste paper broker or other person from whom the post-consumer waste paper was purchased or otherwise obtained.

Response No. 15: None.

16. To the extent available and not otherwise identified in response to Requests #14-15 above, identify the current names, addresses and phone numbers for all waste paper brokers or other person from whom you purchased or otherwise obtained any type of secondary fiber during the period 1954 to 1989.

Response No. 16. None.

Process Water Management; Wastewater Treatment; Wastewater Sludge Disposal

17. For the period 1954 to 1989 and for each American Fibrit mill, identify the dates (month and year) when save-alls were installed and/or upgraded on each paper machine at the mill.

Response No. 17: Not applicable.

18. For each save-all identified in response to Request #17, specify the type of each save-all and the estimated efficiency of fiber recovery in per cent.

Response No. 18: Not applicable.

19. For the period 1954 to 1989 and on an annual basis, identify the volume and disposition of each of the wastewater streams generated at each American Fibrit mill (*e.g.*, discharged directly to a receiving water with or without treatment; discharged indirectly through a municipal sewerage system; or discharged to an off-site industrial wastewater treatment system), including but not limited to:

- Pulping and/or deinking wastewaters
- Paper machine whitewaters
- Other process and non-process wastewaters (Identify.)

(Reported volumes of the process wastewaters should be specified in either gallons per minute (gpm), gallons per day (gpd), or million gallons per day (mgd).)

Response No. 19: From 1978 to 1989, the American Fibrit mill discharged its wastewater to the Battle Creek, Michigan POTW. Currently, the mill uses and discharges an average of 35,000 gallons of water per month. Usage data from 1978-1989 has not been located.

20. For the period 1954 to 1989 and on an annual basis, for each of the process wastewater streams identified in response to Request #19, identify the type(s) of on-site wastewater treatment, if any, provided (*e.g.*, settling lagoons, primary treatment in clarifiers, secondary biological treatment; advanced wastewater treatment). Provide schematic diagrams of the wastewater treatment facilities and monthly wastewater treatment system operating data for bypassed flow (*i.e.*, untreated or partially treated wastewaters), treated effluent flow and untreated and treated wastewater total suspended solids (TSS) concentrations and mass discharges (*e.g.*, pounds per day).

Response No. 20: Not applicable.

21. For the period 1971 to 1989 and on an annual basis, identify the amount in dry tons of wastewater treatment sludge generated at each American Fibrit mill and the disposition of the sludge (*e.g.*, disposed in on-site or off-site landfills).

Response No. 21. None.

22. Identify the name and location of any facility used for the disposal of wastewater treatment sludge generated at each American Fibrit mill.

Response No. 22: None.

23. Identify any data, analyses or other information regarding potential erosion of waste materials from any lagoon, landfill or other disposal facility identified in your response to Requests #19-22.

Response No. 23: None.

Information Regarding PCBs

24. For each American Fibrit mill, provide copies of all reports, data or other records showing PCB concentrations in the following materials:

Fiber furnishes used at the mill
Paper products produced at the mill

Untreated and treated wastewaters generated at the mill
Wastewater treatment sludges generated at the mill
Atmospheric emissions from the mill
Machine, transformer or other oils used at the mill

Response No. 24: Not applicable.

25. Provide copies of all reports, data or other records in your possession, whether generated by American Fibrit or its consultants, generated by paper industry trade associations and/or research organizations, or generated by government agencies and organizations, showing PCB concentrations in the following materials: secondary fibers used as furnishes to secondary fiber pulp and paper mills; pulp substitutes; virgin pulps; any paper mill products, (*e.g.*, paper, paperboard, tissue); process wastewaters; wastewater treatment sludges; atmospheric emissions, or other materials associated with the pulp and paper industry.

Response No. 25: American Fibrit has no such reports, data or other records in its possession.